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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG. 30 2018

CERTIFIED MAIL 7010 1060 0002 1703 8839
RETURN RECEIPT REQUESTED

Mr. Jay Zimmerman
Division Director
North Carolina Department of Environment and Natural Resources
1611 Mail Service Center
Raleigh, North Carolina 27699

Re: Overview Evaluation of the North Carolina Department of Environment and Natural Resources, Fayetteville Regional Office

Dear Mr. Zimmerman:

The purpose of this letter is to transmit the National Pollutant Discharge Elimination System (NPDES) Overview Evaluation of the North Carolina Department of Environment and Natural Resources, Fayetteville Regional Office, which was conducted by staff from Region 4 of the U.S. Environmental Protection Agency's Science and Ecosystem Support Division the week of June 25-28, 2018. The overall NPDES evaluation was determined to be satisfactory. A report documenting the overview evaluation is enclosed for your review.

If you should have any further questions, please contact Mr. Namon Mathews at (404) 562-9777 or via email at Mathews.Namon@epa.gov.

Sincerely,

David M. Apanian, P.E.
Acting Chief
Municipal and Industrial Enforcement Section
NPDES Permitting and Enforcement Branch

Enclosure

cc: Ms. Connie Wylie
North Carolina Department of Environment and Natural Resources

Project ID: 18-0507

Final Report

NPDES Program Overview Evaluation

North Carolina Department of Environmental Quality – Fayetteville Regional Office

225 Green Street, Suite 714
Fayetteville, NC 28301-5095

Project Date: June 25-28, 2018

Report Date: August 2nd, 2018

Project Leader: Cornell D. Gayle, PE
Enforcement Section
Field Services Branch
Science & Ecosystem Support Division
USEPA – Region 4
980 College Station Road
Athens, Georgia 30605-2720

Science & Ecosystem Support Division

The activities depicted in this report are accredited under the US EPA Region 4 Science and Ecosystem Support Division ISO/IEC 17025 accreditation issued by the ANSI-ASQ National Accreditation Board. Refer to certificate and scope of accreditation AT-1644.

Requestor:
Gracy Danois, Acting Chief
NPDES Permitting and Enforcement Branch
Water Protection Division
USEPA – Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Approvals:
SESD Project Leader:

8/1/18

Cornell D Gayle, PE
Enforcement Section
Field Services Branch

Date

Approving Official:

8/7/2018

Mike Bowden, Chief
Enforcement Section
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Date

State NPDES Overview Evaluation for the North Carolina Department of Environmental Quality (NCDEQ): Fayetteville Regional Office (FRO)

Introduction

During the week of June 25-28, 2018, the United States Environmental Protection Agency (USEPA) conducted a National Pollutant Discharge Elimination System (NPDES) overview of the North Carolina Department of Environmental Quality (NCDEQ) Fayetteville Regional Office (FRO). The overview was conducted to determine if the FRO was meeting their NPDES inspection requirements. The overview included the following:

- Interviewing office personnel responsible for scheduling, planning, and conducting NPDES inspections.
- Reviewing records regarding:
  - NPDES program personnel.
  - Personnel training and qualifications.
  - NPDES self-monitoring equipment.
  - Equipment maintenance and storage.
- Observing office personnel conducting an NPDES inspection.

Summary

The NPDES program was evaluated and found to be acceptable. Table 1 shows the inspections conducted as part of the overview.

Table 1: NCDEQ Lead NPDES Compliance Inspections

Inspection Type	Facility Name	Inspector
Compliance Sampling Inspection	Smithfield Farmland Corp (Tar Heel, NC / NC0078344)	Mark Brantley and Johnathan Watts
Compliance Evaluation Inspection	Town of Clarkton (Clarkton, NC / NC0021610)	Mark Brantley
Compliance Sampling Inspection	Chemours (Fayetteville, NC / NC0003573)	Johnathan Watts

The following comments are provided to enhance the overall NPDES inspection program.

Comments:

- The FRO inspectors demonstrated excellent communication skills explaining compliance issues with facility staff. The inspectors were familiar with the various aspects of the NPDES inspection requirements. Inspectors understood the importance for ensuring the quality and accuracy of analytical data obtained from the Compliance Evaluation Inspections.

- The FRO conducted Compliance Sampling Inspections (CSIs). However, most of these inspections were at Municipal facilities, using the facility's sampling equipment. The FRO should consider conducting a representative number of CSIs across all facility types (Industrial and Municipal), and using their own equipment. This will help verify that facilities are within permit limits, provide a cross-check of the facility's historical self-reported data, and provide a significant regulatory presence. Additionally, CSIs help to ensure that the inspectors maintain proficiency in the area of sampling, including the installation of automatic sampling equipment.

- The FRO should have facility personnel demonstrate the calibration and function of laboratory and field measurement equipment. The FRO should also have facility personnel demonstrate sampling procedures. When applicable, this would include having facility personnel demonstrate automatic sampler programing, operation, and aliquot volume. This is to ensure the 100mL aliquot minimum volume is being collected, a pre- and post-purge cycle occurs, and there is adequate sampler intake velocity of approximately 2ft/second.

- The FRO should consider purchasing additional automatic samplers and pH/DO/Conductivity meters for use in NPDES sampling inspections. Currently, there is one reliable sampler in the district. Should this one malfunction, or the need arise for multiple sampling events, duplicate samples, and general redundancy, the district does not have an additional sampler or components to complete the work.

- The FRO should consider using a designated bound logbook or checklist for each NPDES inspection or facility. Currently, staff use various individual methods for recording inspection findings. Unifying the recording process simplifies the discovery process in the event of litigation.

Regional Field Office Program

1. Staffing Review/Workload

Table 2 shows the FRO's NPDES personnel, their positions, educational background, and their years of experience. The staff scheduled and conducted inspections on a timely basis in order to complete assignments. Table 3.1 below shows the workload conducted by the FRO during the FY2017 inspection year. Table 3.2 shows the workload conducted by the FRO during the FY2018 inspection year at the time of the overview evaluation. Included in the Industrial facility count are facilities which discharge Non-Contact cooling water only. Included in the Municipal facility count are water plant discharges. Bioassy Compliance Inspections are counted as Compliance Sampling Inspections. Other inspections not tabulated, but conducted by staff include Pre-Treatment Inspections and Groundwater Remediation Discharge Inspections.

2. Training

The initial training for the NPDES inspectors consisted of self-study, in-house, and on the job training activities. Included in training for new inspectors is the Basic Inspector Training for Conducting NPDES Compliance Inspections, when available. Six hours of continued education

is provided, annually for anyone who would like to attend. Trainees were encouraged to read the current NPDES Compliance Inspection Manual for additional information regarding sampling, records, and flow measurement requirements as part of their NPDES training in addition to any other changes in applicable laws.

Table 2: FRO NPDES Personnel

Personnel (Name)	Education (Degree)	Experience (Years)
Trent Allen	B.S. Civil Engineering Technology	23
Mark Brantley	B.S. Chemistry	14
Tony Honeycutt	B.S. Biology	14
Chad Turlington	B.S. Fish and Wildlife Management	14
Johnathan Watts	B.S. Environmental Management	2
Hughie White	B.S. Environmental Studies	19

Table 3.1: FRO Workload Activities: FY2017

Facility Type	Total Number of Facilities	CEI	CSI	% Complete of Total
Major Municipal	22	4	7	50
Minor Municipal	36	23	2	69
Major Industrial	6	3	0	50
Minor Industrial	16	12	0	75

Table 3.2: FRO Workload Activities: FY2018 through June 2018

Facility Type	Total Number of Facilities	CEI	CSI	% Complete of Total
Major Municipal	22	0	4	18
Minor Municipal	36	0	0	0
Major Industrial	6	0	1	17
Minor Industrial	16	3	0	19

3. Inspection Procedures

Generally, unannounced inspections were conducted for all NPDES inspections. The inspectors were familiar with all aspects of the NPDES inspection requirements. The inspections were conducted in a satisfactory manner. During the overview, both inspectors demonstrated excellent communications skills explaining the compliance issues with facility managers and process operators. The field monitoring equipment was calibrated in the field offices and rechecked prior to use in the field. Calibration records were kept in bound notebooks. Field notes were written in a variety of notebook types, and checklists. Inspection findings were identified during the walk-through and summarized at the end of the inspection. The compliance inspection procedures consisted of the following components:

- Opening Conference
- Walk-through
- Sampling Review
- Flow Measurement Review
- Closing Conference
- Reporting

4. NCDEQ Inspection Reports

The final reports were stated to generally be completed within 30 days after the initial inspection, pending sampling results. At the time of this report, the State Facility inspection reports have not been received. As a result, a review of the reports has not been conducted.

5. Sampling

In FY2017, several CSIs were completed. It is the FROs practice to conduct five CSIs per year. However, all the CSIs took place during municipal inspections. No industrial facilities were sampled in FY2017.

During the inspection FRO personnel were observed collecting samples. The sample collection method met the NPDES requirements. Samples were packed and preserved as required by state lab requirements. Samples are delivered to the appropriate laboratory (state or contract laboratory) with accompanying chain of custody.

6. NPDES Equipment

NPDES supplies, including monitoring equipment, sample containers, and preservatives. Not all devices were in working condition. Each inspector had access to a vehicle from the motor pool for conducting NPDES-related activities. The sampling staff coordinated equipment decontamination, cleaning and storage of instrumentation used in investigations amongst themselves.

Tables 4 shows the equipment used by the FRO for conducting NPDES sampling activities. Most of the FRO field equipment appeared to be in satisfactory condition.

Table 4: FRO Field Equipment

Equipment	Quantity	Model Number
Accumet pH meter	5	AP62 (needs servicing)
YSI DO meter	2	PRO ODO (needs servicing)
YSI pH/DO Conductivity	1	Signature
ISCO Autosampler	2	6712 with Flow Meter ISCO 710 Ultrasonic Meter attached (1 of 2 need servicing)

7. Work Area/Storage Space

The FRO office had adequate office work space for personnel, equipment, maintenance, cleaning, calibration, and storage. The approximate space available for calibration, maintenance, cleaning, and storage is 650 square feet.